

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

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IN RE GENWORTH FINANCIAL, INC., : No. 3:14-cv-00682-JAG
SECURITIES LITIGATION :
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: Hon. John A. Gibney, Jr.
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**PLAINTIFFS' COUNSEL'S MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND PAYMENT OF LITIGATION EXPENSES**

Bleichmar Fonti & Auld LLP, Susan Podolsky and Bernstein Litowitz Berger & Grossmann LLP (collectively "Plaintiffs' Counsel") respectfully move the Court, pursuant to Rules 23 and 54 of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act, 15 U.S.C. 78u-4(a)(4) ("PSLRA"), for entry of an Order: (a) awarding attorneys' fees in the amount of 29 percent of the Settlement Fund; (b) paying litigation expenses incurred by Plaintiffs' Counsel in the amount of \$3,835,741.96; and (c) reimbursing Class Representatives Her Majesty the Queen in Right of Alberta and Fresno County Employees' Retirement Association for their reasonable costs and expenses, including lost wages, directly related to the representation of the Settlement Class of in the amount of \$23,128.

In support of their motion, Plaintiffs' Counsel submit and file herewith: (a) the Memorandum of Law in Support of Plaintiffs' Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses; and (b) the Joint Declaration of Susan R. Podolsky, Joseph A. Fonti, and David R. Stickney In Support of Proposed Class Settlement, Plan of Allocation, and Award of Attorneys' Fees and Expenses, with annexed exhibits.

A proposed order will be submitted with Plaintiffs' Counsel's reply submission on or before June 29, 2016.

DATED: June 8, 2016

/s/ Susan R. Podolsky

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CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

DATED: June 8, 2016

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